

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

ELIZABETH HOTCHKISS,
on behalf of herself and all others similarly situated,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendant.

**Civil Action No.
5:18-cv-00083-GWC**

**JOINT MOTION TO STAY PENDING
FINAL APPROVAL OF NATIONWIDE CLASS ACTION SETTLEMENT**

NOW COME Plaintiff ELIZABETH HOTCHKISS and Defendant EXPERIAN INFORMATION SOLUTIONS, INC., by their undersigned counsel, and move this Honorable Court to stay this matter pending the approval of a nationwide class settlement, as follows:

1. This matter is one of several putative class actions brought in various jurisdictions against Defendant alleging violations of the Fair Credit Reporting Act, 15 U.S.C. §§ 1681-1681x, regarding Defendant's reporting and disclosure of public record information.

2. Earlier this month, the Parties reached an agreement to resolve this case as part of a nationwide settlement under the auspices of Magistrate Judge David Novak of the United States District Court for the Eastern District of Virginia in the matter of *Clark v. Experian Info. Sols., Inc.*, No. 3:16-cv-00032-MHL (E.D. Va.).

3. The terms of the *Clark* settlement embrace the class claims pled in this litigation and, if approved by the court, would resolve all claims in this matter.

4. On September 17, 2018, plaintiffs' attorneys filed a motion requesting that Judge M. Hannah Lauck of the Eastern District of Virginia preliminarily approve the *Clark* settlement. *See Clark*, ECF Nos. 125 & 126.

5. The Parties have conferred and agree that in the interest of judicial economy, all proceedings in this matter should be stayed until the settlement in *Clark* has been granted final approval, and no further appeals remain.

6. Counsel for the parties anticipate that final approval of the class action settlement will take several months. The parties propose reporting back to the Court in 4 months, on January 25, 2019.

7. Should the *Clark* settlement be finally approved prior to January 25, 2019, with no appeals remaining, the Parties will jointly notify this Court and request the dismissal of this matter with prejudice.

WHEREFORE, the Parties respectfully request that this Court stay this matter pending the Eastern District of Virginia's approval of the *Clark* settlement, and direct that the parties submit a joint status update on January 25, 2019.

Dated: September 21, 2018

Respectfully submitted,

ELIZABETH HOTCHKISS,
by her attorney,

EXPERIAN INFORMATION
SOLUTIONS, INC., by its attorney,

/s/Joshua L. Simonds
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 21, 2018, a true and correct copy of the foregoing **Joint Motion to Stay Pending Final Approval of Nationwide Class Action Settlement** was electronically filed with the Clerk of Court using the CM/ECF system, which provided notification of same to all counsel of record.

/s/Joshua L. Simonds

Joshua L. Simonds